



Subject Guidance for the annual certification process for 2005
calendar year ambient air data on AQS

To: Regional Office personnel who coordinate with reporting organizations in their Region
to have data certified on AQS

From: Phil Lorang, Group Leader, Ambient Air Monitoring Group, OAQPS, RTP

This E-MAIL is being provided as guidance for the annual certification process for 2005 calendar year ambient air data on AQS. By regulation, monitoring reporting organizations are required to certify their data by July 1, 2006. Hopefully this will expedite the process by making the process clear to all participants. (Please note that in 2007 the required date for certification may be earlier, depending on the provisions of the final monitoring rule due in September 2006.)

I. Scope and Regulatory Impact of the Certification Process

Required Scope - The present Part 58 Regulations only require the certification of ambient concentration data from monitors types designated as SLAMS, NAMS, PAMS, and unofficial PAMS. Only criteria pollutants are to be certified. This excludes VOC's, meteorological parameters, and PM-2.5 speciation parameters for trace metals, etc.

Preferred Scope - There have been statements by some data users external to EPA, such as health effects researchers, that they only include data in their analysis that has been certified by the reporting organization. Their rationale is that if the reporting organization has not backed up their data with a certification for the year, then something might be wrong with the data and the data users will exclude the data from their analysis. This screening may cause external data users to omit relevant data that actually is of good quality. Therefore, we are asking that the reporting organizations certify all the criteria pollutant data that they consider to meet the QA requirements of 40 CFR 58 Appendix A, regardless of the monitoring type designation.

The issue of the certification of data from PM2.5 speciation samplers is currently under review in AAMG and is not a part of this request.

Regulatory Impact - Regional Offices and state/local reporting organizations should be aware that ambient data that has not been certified may nevertheless be used in attainment-related findings, depending on other evidence of its quality. However, timely certification can reduce potential disputes about the suitability of ambient data for such purposes and is both required by regulation and highly recommended.

Tribal Monitoring Organizations - Tribes are encouraged to certify their data following the same process described here, but are not required to do so. Data that has not been certified may nevertheless be used in attainment-related findings, depending on other evidence of its quality.

II. Documentation Needed from State or Local Reporting Organizations

Required Documentation - Section 58.26 of the Part 58 regulations requires submission of a signed certification request, and a summary report of the data to be certified. The AMP450

report is recommended to be used to provide this summary of the data to be certified. The request for certification from the reporting organization must include a letter signed by the senior air pollution official, and the AMP450 quick-look report. The senior air pollution official in the reporting organization should have a copy of the AMP450 report to base his/her certification on. If the date of the AMP450 report is later than the signature date of the certification request, there is no assurance that the data in AQS at the time of the AMP450 report is the same as what the official intended to certify. To eliminate large volumes of paper transfer in this process, it is recommend that the reporting organization use electronic files. The signed letter may be scanned and submitted electronically. In past years , there have been many cases where copies and faxes of these reports are blurred and very difficult to read, slowing down the process. In running the AMP450 reports, please click on the report options box and select "yes" for the merge of the pdf files. This attaches the cover sheet to the information selected for the report so that we may see what criteria was selected for the certification request.

The request for certification should be sent to the EPA Regional Administrator. Some Regional Offices require that the only copy to EPA be sent to the Regional Office, while other Regional Offices require that copies be sent to the Regional office as well as OAQPS. The requests for certification which were sent only to the Regional Office in the past have presented problems with requests getting lost and never arriving at OAQPS in North Carolina, so asking the reporting agency to send a copy of the request to OAQPS is a safety net. When a reporting organization or the Regional Office sends a copy to OAQPS, please send it electronically to David Lutz at lutz.david@epa.gov. Or, if you are sending items by mail, David Lutz's address is:

David Lutz
Data Certification Contact
US EPA (D304-06)
Ambient Air Monitoring Group
Research Triangle Park, NC 27711

(919) 541-5476
Fax (919) 541-1903
UPS/FedEx Address:
US EPA (D304-06)
4930 Page Road
Durham, NC 27703

Preferred Documentation - If the required documentation just described is submitted and is not found by the Regional Office or OAQPS to have defects, the reporting organization is considered to have met the current requirements of Section 58.26 of the Part 58 regulations. However, it is OAQPS's practice not to record the certification in AQS unless the corresponding AMP240 report (submitted by the reporting organization or retrieved by OAQPS) shows that minimum required numbers of precision and accuracy checks were performed during each quarter of the monitoring period. We have been using the absence of a certification flag on AQS to inform data users that we do not have evidence that required precision and accuracy checks have been performed. Section 58.26 does not require an AMP240 report for the QA data, but our philosophy is that the certification official's formal certification statement is much stronger when required precision and accuracy checks have been performed and the official had that data available for his/her review before making the certification request. As with the AMP450 report, the AMP240 report should be dated on or before the date of the signed certification request.

Please note that on January 17, 2006 the Administrator proposed changes to the Part 58 regulations, one of which would make it more explicit that the data certifying official must consider QA data when making his/her certification request. Once the rule is final, we will consider whether and how to modify AQS with regard to how certification flags work.

Need to Re-Request Certification After Changing Data - Reporting organizations sometimes find it appropriate to revise data on AQS after the original certification request has been processed and a certification flag set. Any data change that affects the summary statistics in the AMP450 report automatically removes certification flags for the whole year's data for the affected monitor/pollutant. This feature may not be familiar to newer staff and managers, who may not realize or remember to re-submit a certification request. This is a good time of year to catch up on these re-requests. Re-requests need to be signed by the same official as an original certification request. We are preparing a summary of older data that currently does not have certification flags set, to help reporting organizations be aware of what data needs re-certification. Reporting organizations can easily check the certification status of their data on AQS, also.

III. Needed Actions by EPA Regional Offices

The EPA regional Offices should review the package to make sure that a signed certification request is included, as well as the AMP450 and AMP240 reports. It will expedite the process if Regional Office staff would review the submission against the required and preferred documentation requirements described above, and contact the reporting organization promptly to request clarification or re-submission if there are issues. Once the Regional Office feels it has the best set of documentation it can get from the reporting organization, forward the package to David Lutz electronically at the address above, or by mail to the address shown above.

In 2007, Regional Offices will be expected to forward to OAQPS only submission packages for calendar year 2006 data that are complete in the view of the Regional Office.

IV. Processing Steps Within OAQPS

1. David Lutz will check to see if signed letter from an appropriate official has been received requesting certification.
2. David Lutz will check to see if any of the data on the AMP450 for the certification period has been added, deleted, or changed on AQS since the request was submitted. If data are changed the summary statistics on AQS would be different from the summary statistics submitted with the certification letter. This indicates that there are data in AQS that may not have been within the intended scope of the certification request. If there were changes, the Regional Office contact will be notified, and he/she should notify the reporting organization with a suggestion that a new letter be signed. Also, if the date of the retrieval of the AMP450 and AMP240 reports is after the date of the certification request, this will be pointed out to the Regional Office contact with the same suggestion.
3. David Lutz will check to see if precision and accuracy data has been reported as required by the regulations. The completeness of the precision and accuracy data will be evaluated. If not, he will notify the Regional Office contact who should notify the reporting organization.
4. If all of the above items are satisfactory, David Lutz will enter the certification flag "Y" on

AQS for each site/pollutant. If data has been added, changed, or deleted since the date of the certification request, if the AMP450 report is later than the signature date of the request, or if the precision and accuracy data are insufficient, then the certification flag "N" will be entered for each site. David Lutz will send feedback to the appropriate Regional Office contact once he has determined whether to set the "Y" flag or the "N" flag. (Strictly speaking, a "N" flag does not necessarily mean that the reporting organization has failed to meet the requirement Section 58.26 of the Part 58 regulations, since this section currently is not so explicit as to required documentation. We realize this may cause confusion among reporting organizations and data users, and as mentioned above we will review how certification flags work after the final rule.)

Please forward this E-MAIL to the reporting organizations in your Region who will be submitting the certification request. If you have any questions, please contact David Lutz by E-MAIL or via the phone number listed above. Thanks for your help.

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